1 Richard G. McCracken, Esq. (SBN 2748) Kimberley C. Weber, Esq. (SBN 14434) 2 McCRACKEN, STEMERMAN & HOLSBERRY, LLP 3 1630 S. Commerce Street, Suite A-1 Las Vegas, NV 89102 4 Tel.: (702) 386-5107 5 Fax: (702) 386-9848 Email: rmccracken@msh.law 6 kweber@msh.law 7 ATTORNEYS FOR DEFENDANTS. 8 Las Vegas Police Protective Association Metro, Inc. 9 10 UNITED STATES DISTRICT COURT 11 FOR THE DISTRICT OF NEVADA 12 CASE NO. 2:20-cv-01481-GMN-VCF 13 MELODIE DEPIERRO, an individual 14 Plaintiffs, STIPULATION, REQUEST, AND ORDER 15 EXTENDING TIME TO REPLY TO 16 LAS VEGAS POLICE PROTECTIVE PLAINTIFF'S RESPONSE TO ASSOCIATION METRO, INC., a Nevada 17 **DEFENDANTS' MOTIONS TO DISMISS** non-profit corporation; and LAS VEGAS (First Request) 18 METROPOLITAN POLICE DEPARTMENT, a political subdivision of the State of Nevada 19 Defendants. 20 21 Defendant Las Vegas Police Protective Association ("LVPPA"), by and through its 22 attorney, Richard G. McCracken, Esq.; Defendant Las Vegas Metropolitan Police Department 23 ("LVMPD"), by and through its attorney Nick D. Crosby, Esq.; and Plaintiff Melodie DePierro, 24 by and through her attorney Angel J. Valencia, Esq. hereby respectfully submit this Stipulation, 25 Request, and Order Extending Time to Reply to Plaintiff's Response to Defendants' Motions to 26 Dismiss. This Stipulation is made in accordance with LR IA 6-1, LR IA 6-2, and LR II 7-1 of 27 the Local Rules of this Court. 28

STIPULATION, REQUEST, AND ORDER EXTENDING TIME TO REPLY TO PLAINTIFF'S RESPONSE TO

CASE NO. 2:20-CV-01481-GMN-VCF

DEFENDANTS' MOTIONS TO DISMISS (First Request)

This is the first request for an extension of time to file a reply to Plaintiff's response to 1 2 Defendants' motions to dismiss. Defendant LVMPD's motion to dismiss was filed on 3 September 23, 2020. Defendant LVPPA's motion to dismiss was filed on October 5, 2020. 4 Plaintiff's response to both motions was filed on October 19, 2020. The below extensions is 5 requested as counsel for LVMPD and LVPPA require additional time to prepare a reply to Plaintiff's response. 6 7 Upon agreement between all the parties, the undersigned respectfully requests the Court grant an extension of time to November 2, 2020 for LVPPA and LVMPD to file their respective 8 9 replies to Plaintiff's response to Defendants' motions to dismiss. 10 DATED: October 21, 2020 11 McCRACKEN, STEMERMAN & HOLSBERRY 12 13 /s/ Kimberley C. Weber Richard G. McCracken, Esq. (SBN 2748) 14 Kimberley C. Weber, Esq. (SBN 14434) 1630 S. Commerce Street, Suite A-1 15 Las Vegas, NV 89102 16 Attorneys for Defendant Las Vegas Police Protective Association Metro, Inc. 17 18 19 /s/ Nick D. Crosby Nick D. Crosby, Esq. 20 Nevada Bar No. 8996 21 MAROUIS AURBACH COFFING 10001 Park Run Drive 22 Las Vegas, Nevada 89145 Attorney for Defendant Las Vegas Metropolitan Police 23 Department 24 25 26 27 28

1 /s/ Angel J. Valencia\_ 2 Ángel J. Valencia (D.C. Bar No. 1552471) (Pro Hac Vice) 3 ajv@nrtw.org Milton L. Chappell (D.C. Bar No. 936153) (Pro Hac Vice) 4 mlc@nrtw.org c/o NATIONAL RIGHT TO WORK LEGAL 5 DEFENSE FOUNDATION, INC. 6 8001 Braddock Road, Suite 600 Springfield, Virginia 22160 7 Attorneys for Plaintiff Melodie DePierro 8 9 **ORDER** 10 11 IT IS SO ORDERED. Dated this 22 day of October, 2020. 12 13 14 15 Gloria M. Navarro, District Judge United States District Court 16 17 18 19 20 21 22 23 24 25 26 27 28

## **CERTIFICATE OF SERVICE** 1 2 3 I hereby certify that on this 21<sup>st</sup> day of October, 2020, the foregoing **STIPULATION**, REQUEST, AND ORDER EXTENDING TIME TO REPLY TO PLAINTIFF'S 4 RESPONSE TO DEFENDANTS' MOTION TO DISMISS (First Request) was made by 5 electronic service via CM/ECF filing system upon the following: 6 7 8 Georlen K. Spangler, Esq. Stephen A. Davis, Esq. THE LAW OFTICE OF GEORLEN K. SPANGLER spanglerlaw@outlook.com 10 sdavislaw@outlook.com 11 Attorneys for Plaintiff 12 13 Angel J. Valencia, Esq. (pro hac vice) Milton L. Chappell, Esq. (pro hac vice) 14 c/o NATIONAL RIGHT TO WORK LEGAL DEFENSE FOUNDATION, INC. 15 ajv@nrtw.org mlc@nrtw.org 16 17 Attorneys for Plaintiff 18 19 Nick D. Crosby, Esq. MARQUIS AURBACH CUFFING 20 ncrosby@maclaw.com 21 Attorney for Defendant Las Vegas 22 Metropolitan Police Department 23 24 25 Dated: October 21, 2020 26 27 28